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10 Attorneys for Plaintiff  
11 United States of America

12  
13 IN THE UNITED STATES DISTRICT COURT  
14 EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,

16 Plaintiff,

v.

17 GONZALO HERNANDEZ,  
18 aka GONZALO RUIZ,

19 Defendant.

CASE NO. 2:25-CR-0151-DAD

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: August 18, 2025

TIME: 9:30 a.m.

COURT: Hon. Dale A. Drozd

17 STIPULATION

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and  
19 through defendant's counsel of record, hereby stipulate as follows:

- 20 1. By previous order, this matter was set for status on August 18, 2025.  
21 2. By this stipulation, defendant now moves to continue the status conference until October  
22 27, 2025, and to exclude time between August 18, 2025, and October 27, 2025, under Local Code T4.  
23 3. The parties agree and stipulate, and request that the Court find the following:  
24 a) The government has represented that the discovery associated with this case  
25 includes investigative reports and related documents in electronic form totaling more than  
26 approximately 1100 pages of documents. The discovery also includes various videos recordings,  
27 including recorded statements of the two minor victims and Defendant Hernandez. In addition,  
28 there is discovery that contains child sexual abuse material that cannot be produced, but that has

1           been made available for defense counsel's review at FBI. All of this discovery has been either  
2           produced directly to counsel and/or made available for inspection and copying.

3           b)       Counsel for defendant desires additional time review the evidence, and  
4           particularly the evidence available for review at FBI; to confer with his client, who is in custody,  
5           to review the charges and potential resolutions, and to otherwise prepare for trial, if necessary.

6           c)       Counsel for defendant believes that failure to grant the above-requested  
7           continuance would deny him/her the reasonable time necessary for effective preparation, taking  
8           into account the exercise of due diligence.

9           d)       The government does not object to the continuance.

10          e)       Based on the above-stated findings, the ends of justice served by continuing the  
11           case as requested outweigh the interest of the public and the defendant in a trial within the  
12           original date prescribed by the Speedy Trial Act.

13          f)       For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
14           et seq., within which trial must commence, the time period of August 18, 2025 to October 27,  
15           2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
16           T4] because it results from a continuance granted by the Court at defendant's request on the basis  
17           of the Court's finding that the ends of justice served by taking such action outweigh the best  
18           interest of the public and the defendant in a speedy trial.

19           *The remainder of this page is intentionally blank.*

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

## IT IS SO STIPULATED.

Dated: August 12, 2025

**ERIC GRANT**  
United States Attorney

/s/ SHELLEY D. WEGER  
SHELLEY D. WEGER  
Assistant United States Attorney

Dated: August 12, 2025

/s/ DOUG BEEVERS  
DOUG BEEVERS  
Counsel for Defendant  
GONZALO HERNANDEZ

## ORDER

Pursuant to the stipulation of the parties and good cause appearing, the status conference previously scheduled for August 18, 2025, is continued to October 27, 2025, at (:30 a.m. and time is excluded between August 18, 2025, and October 27, 2025, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

IT IS SO ORDERED.

Dated: August 12, 2025

Dale A. Drozd  
DALE A. DROZD  
UNITED STATES DISTRICT JUDGE